

Exhibit A

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF F WASHINGTON
AT TACOMA

C.P., by and through his parents,)
Patricia Pritchard and Nolle)
Pritchard and PATRICIA PRITCHARD,)
Plaintiffs,)
vs.) No. 3:20-cv-06145-RJB
BLUE CROSS BLUE SHIELD OF)
ILLINOIS,)
Defendant.)

ZOOM VIDEO DEPOSITION UPON ORAL EXAMINATION
OF
TELISA DRAKE 30 (B) (6)

9:30 a.m.

May 13, 2022

REPORTED BY: Pat Lessard, CCR #2104

1 A P P E A R A N C E S

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3 FOR THE PLAINTIFFS:

4 MS. ELEANOR HAMBURGER

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A P P E A R A N C E S

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FOR THE DEFENDANT:

5

MS. GWENDOLYN PAYTON

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MS. STEPHANIE BEDARD

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ALSO PRESENT:

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WARREN BREY, Videographer

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1 some or all gender-affirming health care, including
2 the CHI plan's exclusion, violated its fiduciary
3 duties?

4 This is topic 2.o.

5 MS. PAYTON: Object to the form.

6 You can answer.

7 A. No.

8 Q. (By Ms. Hamburger) Does Blue Cross
9 Blue Shield continue to allow its ASO plans the choice
10 of covering or excluding gender-affirming care?

11 MS. PAYTON: Object to the form.

12 A. Yes.

13 Q. (By Ms. Hamburger) Does Blue Cross
14 Blue Shield of Illinois intend to stop allowing the
15 ASO plans the choice of covering or excluding
16 gender-affirming care?

17 MS. PAYTON: Object to the form.

18 A. No.

19 MS. HAMBURGER: Can we take five minutes and
20 see where we are?

21 Take a little break.

22 THE VIDEOGRAPHER: We're now off the record
23 at 1:50 p.m.

24 (Recess.)

25 THE VIDEOGRAPHER: I'm sorry, Ms. Hamburger.